

EXHIBIT 10

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION**

**12-md-02311
Honorable Marianne O. Battani**

In Re: WIRE HARNESS CASES

**THIS RELATES TO:
ALL DEALERSHIP CASES**

2:12-cv-00102-MOB-MKM

**DEALERSHIP PLAINTIFFS' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS DIRECTED TO ALL DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, the Dealership Plaintiffs serve this First Set of Requests for Production of Documents to All Defendants. Plaintiffs request that Defendants produce the documents described below for inspection and copying, within thirty (30) days after service hereof, at the offices of Larson • King, LLP, 30 East Seventh Street • Suite 2800 St. Paul, MN 55101 or at such other place, time or manner as mutually agreed by the parties.

REQUESTS TO ALL DEFENDANTS

1. All documents and other materials showing how employees were trained or instructed to bid and set prices submitted to OEMs and other purchasers or potential purchasers, for Wire Harness Products, as part of RFQs, or any other procurement process, including management and instruction documents setting forth the lowest bid or price employees were authorized to submit, how to determine the lowest allowable bid or price, and when and how to increase or decrease a proposed bid or price.

2. All Documents, including studies and analyses, showing the relationship between prices charged or submitted to different OEMs, for Wire Harness Products, through RFQs and any other procurement process, including Documents concerning the use of base prices.
3. All Documents concerning any agreement or understanding that prices charged to one OEM for Wire Harness Products will not be below prices charged to another OEM.
4. All Documents including studies and analyses, showing the relationship between prices charged or submitted, for Wire Harness Products, for different vehicle models, made by the same OEM, through RFQs and any other procurement process, including Documents concerning the use of base prices.
5. All Communications with OEMs regarding prices for Wire Harness Products charged or submitted to them or other actual or potential purchasers of Wire Harness Products.
6. All Documents related to requests by your customers or potential customers that you decrease prices charged, submitted or provided for any Wire Harness Product and techniques used to accomplish these reductions.
7. All bids related to Wire Harness Products that were formulated by you or any other Defendant or Wire Harness Product manufacturer or seller, but not submitted to any actual or potential purchaser or customer, and documents describing or discussing why those bids were not submitted.
8. All Documents related to discussions regarding post-RFQ pricing and value engineering pricing, including discussions among your employees and between you and your customers and potential customers.
9. All Documents relating to automobile dealers, including automobile dealer purchases of vehicles and Wire Harness Products.

10. All Documents relating to the named Plaintiffs in this action.
11. All Documents related to your or other Defendants' negotiations or communications with any OEMs in connection with the facts described in Dealership Plaintiffs' Complaint and Documents you or any other Defendant provided to OEMs or other customers, in connection with the facts described in Dealership Plaintiffs' Complaint.
12. All Documents relating to OEMs' sales to their customers of vehicles and Wire Harness Products.
13. All Documents related to the impact of Wire Harness Prices on motor vehicle prices.
14. All Documents related to the impact of original equipment Wire Harness Product prices on prices of replacement Wire Harness Products sold by you to your customers or potential customers.
15. All Documents responsive to requests 1-14, *supra* and previously served requests by Direct Purchaser Plaintiffs and End-Payor Plaintiffs, for any entities you acquired or whose assets you acquired during the relevant period or with whom you merged during the relevant period, who sold or manufactured Wire Harness Products during that period.

DEFINITIONS

The following Definitions apply to these Requests:

1. "Agreement" means any oral or written contract, arrangement or understanding, whether formal or informal, between two or more persons, together with all modifications and amendments thereto.
2. "All" includes "each" and "any," and vice versa.